

# EXHIBIT 4

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION

CARRIE CONLEY, et al.,  Plaintiffs,  v.  ALAN HIRSCH, et al.,  Defendants.	No. 5:25-cv-00193
----------------------------------------------------------------------------------------------------	-------------------

**DECLARATION OF JENNIFER RUBIN, PRESIDENT  
OF THE LEAGUE OF WOMEN VOTERS OF NORTH CAROLINA**

I, Jennifer Rubin, hereby declare that the following is true and correct, is within my personal knowledge, and if called as a witness I am competent to testify thereto.

1. I reside in Durham, North Carolina, in Durham County where I have lived for approximately ten years.

2. I am a United States citizen, over the age of eighteen, and I have never been convicted of a felony.

3. I am the current President of the League of Women Voters of North Carolina (“LWVNC” or “the League”). I have held this position for the past two years.

4. I am currently a member of the League, and have been a member for the past ten years.

5. The League is a nonpartisan, nonprofit organization whose mission is to facilitate informed and active participation in government by all Americans, increase understanding of

major policy issues, and advocate for legislative changes and policies for the public good. LWFVNC is the North Carolina state affiliate of the League of Women Voters (“LWV”), a nonprofit, nonpartisan, grassroots, community-based membership organization headquartered in Washington, D.C. working to protect and expand voting rights and ensure everyone is represented in our democracy. LWV empowers voters and defends democracy through advocacy, education, mobilization, and litigation at the local, state, and national levels. Founded in 1920 as an outgrowth of the struggle to win voting rights for women, the League now has more than a million members and supporters and is organized in nearly 800 communities and in every state and the District of Columbia. Members of state and local Leagues are also members of LWV.

6. We accomplish this mission, in part, by encouraging North Carolina citizens to register to vote, including by assisting them with understanding the process, and promoting robust civic participation through voter education and assistance to facilitate participation in the electoral process.

7. Conducting voter registration events themselves is an important way in which we engage citizens on the importance of not only political participation and civic engagement, but also political reforms and other issues that are important to the League.

8. We also regularly engage in other activities central to the League’s mission, including community outreach, education, direct advocacy on local and statewide ballot initiatives, and legislative advocacy related to voting and elections.

9. The League has approximately 1,900 members in North Carolina.

10. In my position, I have personal knowledge of the methods the League uses to keep track of its members and have access to the League’s files maintained in its ordinary course of business concerning the League’s membership and the identities and addresses of its members.

This Declaration is based on my personal knowledge and review of the League's membership records.

11. The League's membership databases are maintained by national, state, and local League roster managers based on payment of local League dues. In my position, I have access to membership records in North Carolina.

12. I can confirm that the League has members who vote using the absentee process for overseas and military voters, whose votes are being challenged by Judge Jefferson Griffin because they did not provide photo identification when using the online portal provided by the North Carolina State Board of Elections—even though that portal provided voters no opportunity to submit a copy of their photo identification.

13. The League historically keeps its membership list and member information confidential and takes steps to protect its members' personal privacy.

14. Nevertheless, to ensure the League is able to vindicate its members' most essential and fundamental right to have their vote counted, the League identifies Alana Pierce, an active League member who is being challenged by Griffin for being an overseas voter registered in Buncombe County. The League has obtained Ms. Pierce's consent to provide her identity to the Court.

15. Through his remaining challenges, Griffin seeks to invalidate thousands of validly cast votes, including those of League members, now five months after voting has concluded. Even if these voters were offered a "verification" opportunity, it is our members' strong belief that they should not have to take these additional steps and that they have a right to have their already cast vote be counted.

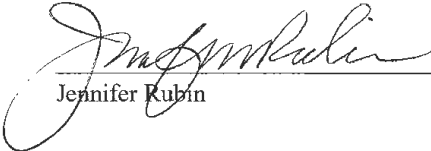
16. There are also practical problems that harm the League and our members with having to comply with this verification process to come. Assuming these voters are successfully contacted and can take action within the time limit established by the North Carolina Supreme Court, having to take time out of their lives and take steps to “cure” a nonexistent deficiency at this late stage is an unacceptable burden on their right to vote. It will burden League members who are being challenged.

17. This verification will also burden the League itself as an organization. The League and our members will have to marshal resources to help our members and voters in our community try to preserve their right to vote that is under attack.

18. In doing so, we will have to divert resources from our other programming this spring in order to try to make sure that overseas and military voters will have their votes counted.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 13<sup>th</sup> day of April, 2025, in Durham, North Carolina.

  
Jennifer Rubin